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13 SUTTER VALLEY MEDICAL FOUNDATION

14 **UNITED STATES DISTRICT COURT**  
15 **EASTERN DISTRICT OF CALIFORNIA**  
16

17 KYONA SANDERS,  
18 Plaintiff,  
19 v.

20 SUTTER VALLEY MEDICAL  
FOUNDATION,  
21 Defendant.  
22

Case No. 2:23-cv-00589-TLN-DB

**JOINT STIPULATION AND ORDER TO  
CONTINUE DISCOVERY DEADLINES**

Trial Date: Not Set

23 This joint stipulation is entered into between Plaintiff KYONA SANDERS (“Plaintiff”) and  
24 Defendant SUTTER VALLEY MEDICAL FOUNDATION (“Defendant” and collectively, with  
25 Plaintiff, the “Parties”), through their respective counsel of record.

26 WHEREAS, the deadline to serve, by hand, all interrogatories, requests for production of  
27 documents, notices of depositions and requests for admission is December 29, 2023;

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1 WHEREAS, the deadline to complete all non-expert fact discovery, including motions to  
2 compel discovery, is January 31, 2024;

3 WHEREAS, the deadline to exchange expert witness disclosures is April 1, 2024;

4 WHEREAS, the deadline to serve evidence intended to contradict or rebut expert witness  
5 disclosures made under FRCP 26(a)(2)(B) or (C) absent a stipulation or court order is May 1, 2024;

6 WHEREAS, if the Parties do not intend to file dispositive motions, they are ordered to file  
7 a Joint Notice of Trial Readiness no later than May 30, 2024;

8 WHEREAS, the last day to file dispositive motions is July 29, 2024;

9 WHEREAS, the first day Defendant could serve discovery, including subpoenas was June  
10 22, 2023, after the Rule 26(f) conference, and Defendant served subpoenas for Plaintiff's medical  
11 records on June 27, 2023, but did not receive all records subpoenaed until September 15, 2023;

12 WHEREAS, Defendant noticed Plaintiff's deposition on September 26, 2023 and took the  
13 deposition of Plaintiff on October 10, 2023;

14 WHEREAS, Defendant sought to take the deposition of Plaintiff's medical provider, Fiona  
15 Arenson, LMFT, on November 7, 2023, but Ms. Arenson requested a continuance to obtain counsel;

16 WHEREAS, Defendant intends to take the deposition of Plaintiff's Kaiser medical provider,  
17 Ladan Khatibijah, Psy.D on December 15, 2023;

18 WHEREAS, Plaintiff's counsel has a trial scheduled to start November 13, 2023 and is  
19 unavailable to attend depositions through the end of November 2023; and

20 WHEREAS, the Parties agree there is good cause to continue all of the above discovery  
21 cutoff deadlines for 60 days, to allow the Parties sufficient time to complete all discovery in this  
22 case. Good cause is shown by the Defendant's timely, diligent pursuit of discovery, and delays  
23 caused by no fault of the Defendant.

24 **IT IS HEREBY STIPULATED AND AGREED** by and among the Parties to seek the  
25 Court's approval as to the following proposed continuances:

26 1. The Parties deadline to complete all non-expert fact discovery, including motions to  
27 compel discovery, be continued to April 1, 2024;

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2. The Parties deadline to exchange expert witness information be continued to May 31, 2024;

3. The deadline to serve evidence intended to contradict or rebut expert witness disclosures made under FRCP 26(a)(2)(B) or (C) absent a stipulation or court order be continued to July 1, 2024;

4. The deadline to file a Joint Notice of Trial Readiness, if the Parties do not intend to file dispositive motions, be continued to July 29, 2024;

5. The deadline to file dispositive motions be continued to September 27, 2024.

DATED: November 8, 2023

**THE VELEZ LAW FIRM, P.C.**

By: /s/ Natalya V. Grunwald

MARK P. VELEZ  
NATALYA V. GRUNWALD  
Attorneys for Plaintiff  
KYONA SANDERS

DATED: November 8, 2023

**HANSON BRIDGETT LLP**

By: /s/ Warren Hodges

JAHMAL T. DAVIS  
WARREN HODGES  
Attorneys for Defendant  
SUTTER VALLEY MEDICAL FOUNDATION

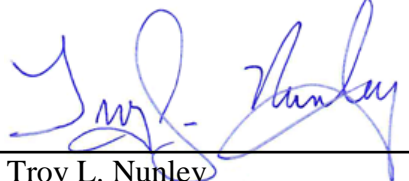
**ORDER**

Based upon the stipulation of the Parties, and good cause appearing, the Court hereby orders the following discovery deadlines be continued as follows:

1. The Parties deadline to complete all non-expert fact discovery, including motions to compel discovery, be continued to April 1, 2024;
2. The Parties deadline to exchange expert witness information be continued to May 31, 2024;
3. The deadline to serve evidence intended to contradict or rebut expert witness disclosures made under FRCP 26(a)(2)(B) or (C) absent a stipulation or court order be continued to July 1, 2024;
4. The deadline to file a Joint Notice of Trial Readiness, if the Parties do not intend to file dispositive motions, be continued to July 29, 2024;
5. The deadline to file dispositive motions shall be continued to September 27, 2024.

IT IS SO ORDERED.

DATED: November 8, 2023

  
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Troy L. Nunley  
United States District Judge